

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MRS. UNITED STATES NATIONAL PAGEANT, INC.,

Plaintiff,

PROPOSED DISCOVERY PLAN

-vs-

Civil Action No. 6:18-CV-06587

STEPHANIE L. WILLIAMS, CROWN GARLAND LLC,
and COSMOS INTERNATIONAL PAGEANTS, INC.,

Defendants.

Plaintiff Mrs. United States National Pageant, Inc. (hereinafter "Plaintiff") and Defendants Stephanie L. Williams, Crown Garland LLC and Cosmos International Pageants, Inc. (hereinafter "Defendants"), by and through their respective counsel, hereby submit this Proposed Discovery Plan in connection with the above matter.

1. **Consent to Magistrate Judge Jurisdiction:** Unanimous consent to disposition of the case by the Magistrate Judge has been agreed upon at this time.

2. **FRCP 26(a)(1) (Mandatory Disclosure requirements):** The parties shall comply with the mandatory disclosure requirements set forth in FRCP 26(a)(1) on or before September 16, 2019.

3. **Electronic Discovery (Local Rule 16(b)(2):** The parties agree to produce documents, including electronically stored information, in either multi-page tiff or pdf format, or in paper copy. The format shall be determined by the producing party from among these alternatives, unless otherwise ordered by the Court. Any electronic production will include appropriate load files, as reasonably necessary. Each image or page shall bear identifying Bates numbers. Any production in multi-page tiff or pdf format

shall be contained on one or more CDs, DVDs or other external storage device. Formatting shall be in accordance with Local Rule 26(e). Any database, spreadsheet, or PowerPoint presentations must be produced in their native files.

4. **Filing of Motions to Amend Pleadings or to Add Parties:** The parties shall file motions to amend pleadings on or before August 16, 2019. Any third party action shall be commenced on or before the same date.

5. **Deadline for Completion of Fact Discovery:** The parties shall complete fact discovery on or before February 28, 2020.

6. **Deadline for Completion of Expert Discovery:** Plaintiff shall identify any expert witness as set forth in FRCP 26(a)(2)(A) and provide written reports or disclosures pursuant to FRCP 26(2)(B) and/or (C) by March 31, 2020. Defendants shall identify any expert witness as set forth in FRCP 26(a)(2)(A) and provide written reports or disclosures pursuant to FRCP 26(2)(B) and/or (C) by April 30, 2020. All expert discovery, including depositions, shall be completed by June 30, 2020.

7. **Deadline for Filing Motions to Compel Discovery:** All motions to compel discovery shall be filed at least thirty (30) days prior to the factual discovery deadline (by January 28, 2020).

8. **Protective/Confidentiality Orders [FRCP 26(c)]:** In the event that certain documents containing sensitive information may need to be covered by a confidentiality order, the party seeking such protection shall propose an order to the Court with consent of opposing counsel.

9. **Limitations on Discovery:** The parties do not anticipate any changes to the limitations on discovery as provided in Rules 30 and 33 of the Federal Rules of Civil Procedure.

10. **Deadline for Filing Dispositive Motions:** All dispositive motions shall be filed on or before September 30, 2020.

11. **Dispute Resolution:** The parties already participated in a Court-ordered mediation following the Court's decision in Plaintiff's Motion for a Preliminary Injunction.

12. **Jury Trial:** A demand for a jury trial was made in the Complaint. The parties estimate that the length of such trial would be one week.

Dated: July 18, 2019

s/ Laura A. Myers

Laura A. Myers, Esq.

Michael R. Wolford, Esq.

The WOLFORD LAW FIRM LLP

*Attorneys for Defendants Stephanie L. Williams,
Crown Garland LLC and Cosmos International
Pageants, Inc.*

600 Reynolds Arcade Building

16 East Main Street

Rochester, New York 14614

Telephone: (585) 325-8000

E-mail: mwolford@wolfordfirm.com
lmyers@wolfordfirm.com

Dated: July 18, 2019

s/ Paul L. Leclair

Paul L. Leclair, Esq.

Stacey E. Trien, Esq.

LECLAIR KORONA COLE, LLP

*Attorneys for Plaintiff Mrs. United States
National Pageant, Inc.*

28 E. Main Street, Ste. 1500

Rochester, New York 14614

Telephone (585) 327-4100

E-mail: p.leclair@leclairkorona.com
strien@leclairkorona.com